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JUN - 9 2000

Regina McNeil Senior Attorney PROBERAL CLARAURICATIONS COMMISSION
OFFICE OF THE SECRETARY

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June 9, 2000

Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street, N.W. TW-A325 Washington, D.C. 20554

Re:

CC Docket No. 98-137 - 1998 Biennial Regulatory Review—

Review of Depreciation Requirements

CC Docket No. 99-117, Ameritech Corporation Telephone Operating

Companies Continuing Property Records, et al

AAD File No. 98-26 - GTE Telephone Operating Companies Release

of Information Obtained During Government Audit

Notice of Ex Parte 6/8/2000

Dear Ms. Salas:

On June 8, 2000, James W. Frame, Vice President- Operations of the National Exchange Carrier Association, Inc. (NECA) responded to questions from Ken Moran of the Commission's Accounting Safeguards Division (ASD) regarding the effects of freezing depreciation rates, as proposed by a number of larger carriers in the context of the above proceedings.

At the request of Mr. Moran, Mr. Frame provided data that describe the results of NECA analyses of average growth in various components of universal service fund (USF). The basis of the analyses is information filed with the FCC by NECA in the October 1, 1999 USF 1999 Data Submission of the 1998 Study Results (USF Submission). Mr. Frame supplied the following statistics:

Four year average change (based on the USF Submission, extracting Subset 1 Companies, GTE and United for the period 1994 to 1998):

LOOPS: 4.26%

NET PLANT: 0.97%

DEP EXP: 4.81%

TPIS: 4.49%

DPR RSV: 9.80%

OPER TAXES: 9.04%

No. or Copies rec'd List A B C D E Ms. Magalie Roman Salas June 9, 2000 Page 2 of 2

Percent of USF Loop revenue requirement (based on 1998 price cap company data included in the USF Submission)

Expenses = 66.3% Taxes = 15.8%

Return = 17.9%

Additionally, Mr. Frame supplied the attached information, which was used to calculate the above.

In accordance with Section 1.1206(a)(1) of the Commission's rules, two copies of this Notice are being submitted to your office for each of the above-referenced proceedings. Additionally, a copy has been provided to the International Transcription Service (ITS).

Acknowledgment of receipt of this notice of ex parte is requested. A duplicate letter is provided for this purpose.

Sincerely,
Regina Mª Neil (REF)

Encl.

cc: Ken Moran, ASD Debbie Byrd, ASD

ITS

SAR_ID_SAR_ABBR	CC NAME	USFLOOPS	TPIS	DEPR	NET PLANT	DEP EXP	OPER TAX
305150 OHIO BELL TEL CO	Ameritech	3.41%	3,88%	8.66%	0.56%	3.64%	6.40%
315090 MICHIGAN BELL TEL CO	Ameritech	3.66%	3.39%	11.47%	-2.07%	5.23%	26.97%
325080 INDIANA BELL TEL CO	Ameritech	4.21%	2.82%	7.88%	-2.89%	0.19%	49.72%
335220 WISCONSIN BELL	Ameritech	2.74%	2.21%	5.43%	-0.54%	2.00%	41.29%
345070 ILLINOIS BELL TEL CO	Ameritech	4.39%	5.44%	12.05%	1.09%	2.11%	32.53% 15.13%
165120 NEW JERSEY BELL	Bell Atlantic	4.65%	5.37% 3.91%	10.06% 10.27%	2.44% 0.38%	1.57% 4.87%	11.08%
175000 BELL OF PENNSYLVANIA	Bell Atlantic	3.19% 4.18%	5.06%	12.14%	1.08%	7.88%	8.25%
185030 C & P TEL CO OF MD 195040 C & P TEL CO OF VA	Bell Atlantic Bell Atlantic	4.75%	6,60%	12.72%	3.00%	2.29%	12.95%
205050 C & P TEL CO OF WV	Bell Atlantic	2.88%	4.53%	12.49%	-0.85%	6.27%	2.77%
565010 DIAMOND STATE TEL	Bell Atlantic	4.98%	6.63%	11.46%	3.91%	3.16%	15.46%
575020 C & P TEL CO OF WASH	Bell Atlantic	2.53%	7.98%	9.68%	7.67%	5.00%	21.27%
215191 SOUTHERN BELL-FL	BellSouth Telecomm.	5.53%	4.44%	11.16%	-0.96%	3.70%	2.71%
225192 SOUTHERN BELL-GA	BellSouth Telecomm.	6.14%	5.90%	10.93%	2.07%	5.42%	14.86%
235193 SOUTHERN BELL-NC	BellSouth Telecomm.	5.87%	6,66%	12.59%	2.13%	5.79%	11.49%
245194 SOUTHERN BELL-SC	BellSouth Telecomm.	4.53%	5.14%	13.29%	-0.82%	4.06% 4.76%	5.68% 2.62%
255181 SO CENTRAL BELL-AL	BellSouth Telecomm.	2.87%	3.69% 4.30%	9.16% 10.43%	-1.11% -0.73%	4.76%	11.98%
265182 SO CENTRAL BELL-KY	BellSouth Telecomm.	3.19% 3.49%	3.26%	9.63%	-2.98%	3.85%	9.07%
275183 SO CENTRAL BELL-LA	BellSouth Telecomm. BellSouth Telecomm.	3.26%	3.56%	11.25%	-2.83%	2.97%	9.35%
285184 SO CENTRAL BELL-MS 295185 SO. CENTRAL BELL-TN	BellSouth Telecomm.	3,46%	5.02%	10.98%	0.53%	1.84%	14.59%
105111 NEW ENGLAND TEL-ME	NYNEX Svc Co	3.65%	3.62%	9.54%	-0.49%	-0.72%	16.01%
115112 NEW ENGLAND TEL-MA	NYNEX Svc Co	4.35%	4.24%	7.92%	3.03%	1.97%	12.50%
125113 NEW ENGLAND TEL-NH	NYNEX Svc Co	5.37%	3.98%	10.03%	0.57%	1.57%	19.39%
145115 NEW ENGLAND TEL-VT	NYNEX Svc Co	3.67%	3.43%	9.37%	-0.66%	-2.11%	26.04%
155130 NEW YORK TEL CO	NYNEX Svc Co	2.62%	3.53%	5.90%	2.76%	-0.88%	6.09%
585114 NEW ENGLAND TEL - RI	NYNEX Svc Co	3.93%	3.37%	8.72%	0.21%	1.59%	14.51%
545170 PACIFIC BELL	Pacific Telesis	3.57%	3.66%	7.85%	0.29%	4.90% 6.44%	10.97% -18.39%
555173 NEVADA BELL	Pacific Telesis	6.49%	6.92% 2.78%	12.66% 6.92%	4.99% 1.13%	5.14%	-10.49%
135200 SOUTHERN NEW ENGLAND	Southwestern Bell	4,27% 4.11%	4.35%	8.48%	2.16%	8.14%	8.34%
405211 SOUTHWESTERN BELL-AR 415214 SOUTHWESTERN BELL-KS	Southwestern Bell Southwestern Bell	4.11%	4.25%	10.40%	1.03%	13.81%	0.56%
425213 SOUTHWESTERN BELL-MO	Southwestern Bell	3.98%	3.63%	10.82%	0.40%	15.26%	-0.49%
435215 SOUTHWESTERN BELL-OK	Southwestern Bell	4.03%	3.11%	6.85%	0.03%	9.58%	1.82%
445216 SOUTHWESTERN BELL-TX	Southwestern Bell	5.88%	5.84%	8.27%	5.41%	12.49%	4.03%
355141 U S WEST, INC IA	U.S. West	2.44%	2.41%	9.85%	-3.61%	5.30%	14.46%
365142 U S WEST, INC MN	U.S. West	3.44%	3.34%	10.30%	-1.40%	2.34%	28.74%
375143 U S WEST, INC NE	U.S. West	1.80%	-0.70%	4.64%	-4.74%	7.64%	9.96%
385144 U S WEST, INC ND	U.S. West	-2.57%	-4.66%	0.54%	-8.70%	-5.63% -2.30%	14.16% 10.19%
395145 U S WEST, INC SD	U.S. West	-1.42%	-2.32% 5.92%	4.04% 12.75%	-7.07% 2.70%	3.80%	16.53%
455101 U S WEST, INC AZ	U.S. West	6.07% 14.52%	9.63%	9.62%	11.47%	12.56%	7.20%
462187 EL PASO COUNTY TEL	U.S. West U.S. West	4.51%	5.49%	12.84%	2.47%	6.16%	12.50%
465102 U S WEST, INC CO 475103 U S WEST, INC ID	U.S. West	4.25%	4.75%	15.87%	-1.61%	9.16%	13.72%
475162 U S WEST, INC ID	U.S. West	4.56%	3.82%	15.87%	-3.98%	9.42%	14.08%
485104 U S WEST, INC MT	U.S. West	3.15%	5.36%	14.89%	0.41%	6.92%	17.41%
495105 U S WEST, INC NM	U.S. West	3.31%	4.62%	11.45%	0.47%	7.81%	15.64%
505107 U S WEST, INC UT	U.S. West	5.65%	6.87%	9.77%	6.46%	13.85%	12.19%
515108 U S WEST, INC WY	U.S. West	2.45%	3.68%	9.64%	0.85%	-0.61%	3971.00% 0.77%
525161 U S WEST, INC WA	U.S. West	3.88%	3.90%	11.78%	-0.58% -0.56%	8.17% 4.29%	6.05%
532456 MALHEUR HOME TEL CO	U.S. West	3.33%	4.35% 4.59%	14.29% 11.33%	0.88%	4.75%	17.05%
535163 U S WEST, INC OR	U.S. West	4.04%	4.5576	11.5576	0.0070	4.7070	
SUMMARY SUBSET 1		4,05%	4.34%	9.48%	1.03%	4.43%	10.67%
SUMMART SUBSET T		.,					
170169 GTE NORTH INC PA	GTE Corporation	3.35%	3.75%		-0.93%	5.86%	-8.28%
170170 CONTEL PA DBA GTE PA	GTE Corporation	4.08%	3,58%	5.74%	2.88%	6.53%	-4.69% 0.00%
170201 GTE NORTH, INC PA	GTE Corporation	4.32%	3.02%		-1.56%	3.71%	-0.83%
190233 CONTEL VA DBA GTE VA	GTE Corporation	6.43%	5.22%		1.27%	11.95%	12.74%
190479 GTE SOUTH INC VA	GTE Corporation	2.88%	2.66%		-8.93%	2.93%	33.44%
210328 GTE FLORIDA INC.	GTE Corporation	5.05%	5.82%		0.93% 2.91%	4.68% 10.80%	1.86% 24.57%
230479 GTE SOUTH INC - NC	GTE Corporation	7.10%			4.68%	13.28%	-21.98%
230509 CONTEL NC DBA GTE NC	GTE Corporation	5.79% 5.24%			-0.83%	5.18%	1.79%
240479 GTE SOUTH INC SC	GTE Corporation GTE Corporation	8.11%			1.37%	16.11%	50.34%
240526 CONTEL-SC DBA GTE SC 250281 CONTEL AL DBA GTE AL	GTE Corporation	4.59%	5.19%		3.63%	9.59%	14.33%
250293 GTE SOUTH INC AL	GTE Corporation	3.81%			-1.03%		11.77%
260407 GTE SOUTH INC KY	GTE Corporation	4.25%			0.03%		2.69%
260410 CONTEL KY DBA GTE KY	GTE Corporation	4.26%	4,38%	12.18%	-0.49%	6.49%	52.58%

SAR_ID_SAR_ABBR	CC NAME	USFLOOPS	TPIS	DEPR	NET PLANT	DEP EXP	OPER TAX
300615 GTE NORTH INC OH	GTE Corporation	4.70%	4.67%	7.21%	2.28%	4.31%	-8.37%
310695 GTE NORTH INC MI	GTE Corporation	3.93%	2.45%	5.68%	-0.30%	2.97%	-0.27%
313033 CONTEL-SOUTH DBA GTE	GTE Corporation	3.92%	3.69%	7.00%	2.27%	6.04%	20.53%
320772 GTE NORTH INC IN	GTE Corporation	4.15%	4.33%	7.69% e.56%	1.24% 0.20%	3.47% 5.48%	17.34% -7.48%
320779 CONTEL-IN DBA GTE IN	GTE Corporation	4.06% 3.78%	3.54% 4.48%	6.56% 5.39%	4.12%	7.81%	10.68%
323034 CONTEL SOUTH-GTE IN 330886 GTE NORTH INC WI	GTE Corporation GTE Corporation	4.32%	5.02%	9.04%	0.98%	6.85%	-1.30%
341015 GTE NORTH INC IL	GTE Corporation	3.47%	2.61%	4.47%	-1.06%	1.37%	0.09%
341036 CONTEL IL DBA GTE IL	GTE Corporation	3.74%	2.93%	7.04%	-2.52%	3.70%	-0.35%
343035 GTE SOUTH-IL	GTE Corporation	2.77%	3.14%	3.46%	3.77%	5.05%	-4.07%
351186 GTE NORTH INC IA	GTE Corporation	3.19%	5.06%	8.69%	2.22%	4.73%	-4.74% 16.50%
351207 CONTEL IA DBA GTE IA	GTE Corporation	3.97%	1.78% 4.42%	3.16% 7.80%	-1.92% -1.22%	3.00% 2.93%	21.99%
351790 CONTEL KS DBA GTE IA	GTE Corporation GTE Corporation	2.82% 4.26%	4.14%	5.70%	2.03%	7.44%	6.55%
361140 CONTEL MN DBA GTE MN 361186 GTE NORTH INC MN	GTE Corporation	1.79%	3.21%	5.26%	10.84%	10.17%	-58.30%
371186 GTE NORTH INC NE	GTE Corporation	3.99%	3.82%	9.43%	-1.63%	7.52%	58.68%
401730 CONTEL AR DBA GTE AR	GTE Corporation	6.15%	9.78%	11.74%	8.75%	9.09%	-15.52%
401790 CONTEL KS DBA GTE AR	GTE Corporation	3.45%	13.72%	5.42%	19.13%	15.58%	-114.22%
402080 GTE SOUTHWEST INC-AR	GTE Corporation	2.78%	6.48%	12.33%	0.47%	5.53%	5.99% 32.14%
421186 GTE NORTH INC MO	GTE Corporation	4.06%	7.26%	9.10% -9.84%	8.54% 3.85%	6.89% -6.01%	-15.76%
421789 KS ST DBA GTE E. MO	GTE Corporation	-10.04% 4.25%	-4.34% 4.85%	13.79%	0.46%	2.63%	3.66%
421846 CONT MO DBA GTE MO 421922 CONTEL MO DBA GTE MO	GTE Corporation GTE Corporation	6.87%	8.41%	10.81%	7.74%	8.16%	4.45%
432080 GTE SOUTHWEST INC-OK	GTE Corporation	5.68%	5.17%	8.95%	2.32%	0.38%	-0.79%
442080 GTE SOUTHWEST INC-TX	GTE Corporation	8.41%	5.71%	13.98%	2.14%	8.07%	9.13%
442154 CONTEL TX DBA GTE TX	GTE Corporation	3.35%	5.28%	9.91%	3.76%	11.81%	-19.60%
452302 CONTEL CALIF - AZ	GTE Corporation	4.20%	3.76%	5.32%	1.56%	4.37%	-0.15% 9.20%
472416 GTE NORTHWEST INC-ID	GTE Corporation	5.61%	4.79%	14.88%	-1.01% -2.63%	5.63% 0.18%	10.84%
492080 GTE SOUTHWEST INC-NM	GTE Corporation	3.52%	2.34% 4.35%	4.54% 7.16%	1.84%	-3.04%	-7.24%
492177 CON. WEST DBA GTE NM	GTE Corporation GTE Corporation	5.05% 5.44%	4.96%	12.41%	-0.10%	1.40%	37.68%
522416 GTE NORTHWEST INC-WA 522449 CONTEL NW DBA GTE-WA	GTE Corporation	6.94%	4.59%	14.11%	-2.16%	12.62%	10.46%
532416 GTE NORTHWEST INC-OR	GTE Corporation	5.76%	5.29%	12.18%	1.03%	6.16%	10.38%
542302 CONTEL OF CALIFORNIA	GTE Corporation	3.00%	3.57%	10.67%	-1.52%	5.02%	-19.60%
542319 GTC OF CALIFORNIA	GTE Corporation	3.77%	2.68%	11.33%	-5.50%	6.08%	-2.76% -132.02%
542344 WEST COAST TEL OF CA	GTE Corporation	1.66%	1.80%	9.70% 8.03%	-2.47% 10.79%	0.29% 10.85%	32.71%
552302 CONTEL OF CALIF-NV	GTE Corporation	6.80% 9.40%	9.88% 6.34%	2.36%	8.21%	7.69%	38.07%
613009 GTE ALASKA INC. 623100 GTE HAWAIIAN TEL. CO	GTE Corporation GTE Corporation	2.82%	1.03%	4.80%	-2.93%	6.48%	-7.26%
653700 MICRONESIAN TELECOMM	GTE Corporation	10.03%	5.28%	17.42%	0.88%	-6.36%	26.92%
160138 UNITED TEL - NJ, INC	United Telephone Sys	6.63%	4.99%	8.67%	1.48%	3.53%	7.04%
170209 UTC OF PENNSYLVANIA	United Telephone Sys	3.78%	6.00%	11.74%	2.00%	12.20%	3,55%
190254 CENTEL OF VIRGINIA	United Telephone Sys	4.82%	5.60%	7.40%	5.27%	7.35% 6.12%	21.99% 6.12%
190567 UNITED INTER-MT-VA	United Telephone Sys	4.17%	3.20%	8.82% 19.79%	-2.32% 9.35%	14.68%	12.87%
210341 SPRINT-FLORIDA, INC.	United Telephone Sys	13.97% 5.98%	13.70% 6.70%	16.06%	-0.75%	8.06%	-5.20%
230470 CAROLINA TEL & TEL	United Telephone Sys United Telephone Sys	5.08%	6.11%	9.63%	5.54%	17.54%	11.87%
230471 CENTEL OF NC 240506 UTC OF THE CAROLINAS	United Telephone Sys	6.41%	5.69%	12.41%	-0.99%	5.62%	18.73%
290567 UNITED INTER-MT-TN	United Telephone Sys	5.45%	6.55%	10.94%	2.87%	8.39%	15.53%
300661 UTC OF OHIO	United Telephone Sys	4.13%	5.94%	9.14%	1.36%	4.11%	7.59%
320832 UTC OF INDIANA	United Telephone Sys	3.42%	4.61%	9.40%	-2.11%	4.76%	19.51% 18.36%
361456 UTC OF MINNESOTA	United Telephone Sys	5.24%	8.02%	12.96% 9.09%	3.26% 12.02%	6.80% 7.00%	13.36%
371595 UTC OF THE WEST-NE	United Telephone Sys	2.18% 2.13%	10.00% 6.13%	5.14%	7.95%	9.25%	-0.56%
411317 UNITED OF EASTERN KS	United Telephone Sys United Telephone Sys	0.56%	8.04%	7.50%	6.74%	17.37%	-5.22%
411842 UTC OF KANSAS 411957 UTC-MO DBA UTC-SE KS	United Telephone Sys	2.16%	8.14%	8.93%	7.21%	10.27%	-3.68%
421957 UTC OF MISSOURI	United Telephone Sys	4.32%	8.14%	8.08%	7.94%	6.67%	8.57%
442084 UTC OF TEXAS INC	United Telephone Sys	5.09%	6.75%	12.61%	1.82%	6.77%	0.25%
442114 CENTEL OF TEXAS	United Telephone Sys	6.69%	8.47%	12.16%	6.51%	10.06%	37.05% 14.21%
511595 UTC OF THE WEST-WY	United Telephone Sys	2.27%	6.56%	9.44% 8.84%	4.11% 8.28%	8.07% 6.03%	4.85%
522400 UTC OF THE NW-WA	United Telephone Sys	5.56% 4.93%	7.32% 6.17%	8.84% 13.95%	1.51%	7.23%	4.17%
532400 UTC OF THE NW - OR	United Telephone Sys United Telephone Sys	9.21%	15.44%	17.71%	16.50%	23.80%	-3.26%
552348 CENTEL OF NV	Office Telephone Sys	3.2170	.0.1170				
SUMMARY SUBSET 2 (GTE & UNITED)		5.38%	5.16%	11.35%	0.71%	6.56%	2.27%
		4 000/	4 400/	9.80%	0.97%	4.81%	9.04%
SUMMARY ALL PRICECAP		4.26%	4.49%	3.0070	0.3170	7.5170	3.0170
SUIVINAL I ALL LIVICEDAL							